

THE HONORABLE BENJAMIN H. SETTLE

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

CRYSTAL MORROW, et al.,

Plaintiffs,

vs.

ETHICON, INC., et al.,

Defendants.

Case No. 20-cv-05062-BHS

**DECLARATION OF DAMON C.
ELDER IN SUPPORT OF
DEFENDANTS' SUPPLEMENTAL
MOTION FOR SUMMARY
JUDGMENT**

NOTED: AUGUST 28, 2020

I, Damon C. Elder, declare as follows:

1. I am an attorney with Calfo Eakes LLP and represent Ethicon, Inc. and Johnson and Johnson (collectively, "Ethicon") in this action. I am over eighteen years of age and am competent to testify herein. I make the following statements based on my personal knowledge.

2. Attached as **Exhibit A** is a true and correct copy of a Plaintiff Fact Sheet for Plaintiffs, dated May 11, 2020.

3. Attached as **Exhibit B** is a true and correct copy of excerpts from the deposition of Plaintiff Crystal Morrow, dated June 6, 2018.

4. Attached as **Exhibit C** is a true and correct copy of correspondence from Plaintiffs' counsel, dated June 5, 2018.

ELDER DECL. ISO DEFENDANTS' SUPP.
MOTION FOR SUMMARY JUDGMENT
(Case No. 3:20-cv-05062-BHS) - 1

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1 I declare under penalty of perjury under the laws of the State of Washington that the
2 foregoing is true and correct.

3 DATED this 6th day of August, 2020, at Seattle, Washington.

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5 s/ *Damon C. Elder*

6 Damon C. Elder
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